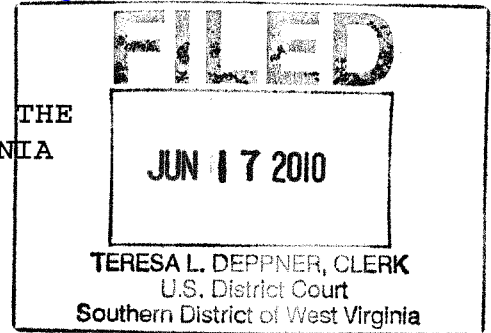


UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON



UNITED STATES OF AMERICA

v.

CRIMINAL NO.

2:10-cr-00095  
18 U.S.C. § 1014  
26 U.S.C. § 7201  
18 U.S.C. § 2

TODD W. JOYCE

I N F O R M A T I O N

The United States Attorney charges:

COUNT ONE

(False Statement to a Financial Institution)

On or about April 21, 2006, in or near Fayetteville, Fayette County, West Virginia, within the Southern District of West Virginia, defendant TODD W. JOYCE, individually as an aider and abettor, knowingly made false statements for the purpose of influencing the actions of United Bank, an institution the accounts of which were then insured by the Federal Deposit Insurance Corporation, in connection with defendant TODD W. JOYCE's application to obtain a construction loan in the amount of \$740,000, in that defendant TODD W. JOYCE presented a false and fraudulent Internal Revenue Service 1040 tax return for the calendar year 2005.

In violation of Title 18, United States Code, Sections 1014 and 2.

COUNT TWO

On or about October 20, 2008, in the Southern District of West Virginia, defendant TODD W. JOYCE, a resident of Hurricane, Putnam County, West Virginia, did willfully attempt to evade and defeat a large part of the income tax due and owing by him to the United States of America for the calendar year 2007, by filing and causing to be filed with the Director, Internal Revenue Service, at Atlanta, Georgia, a false and fraudulent U.S. Individual Income Tax Return, Form 1040, wherein he stated that his taxable income after deductions and exemptions was zero dollars for the calendar year 2007, whereas, as he then and there well knew and believed, his taxable income for said calendar year was substantially in excess of that heretofore stated and that upon said additional taxable income a substantial additional tax was due and owing to the United States of America.

In violation of Title 26, United States Code, Section 7201.

FORFEITURE

In accordance with 28 U.S.C. § 2461(c), 18 U.S.C. § 981(a)(1)(C), and Rule 32.2(a) of the Federal Rules of Criminal Procedure, and premised upon the conviction of the defendant TODD W. JOYCE of a violation of 18 U.S.C. § 1014 as set forth in Count One of this Information, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, including but not limited to the sum of \$820,000.00, more or less, in United States currency in that such sum in aggregate constitutes the gross proceeds derived by the defendant from the false statement offense alleged in Count One, for which sum the United States intends to seek the entry of a judgment.

NOTICE OF INTENT TO FORFEIT SUBSTITUTE ASSETS

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c) and 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of said property listed above as being subject to forfeiture.

UNITED STATES OF AMERICA

A handwritten signature in black ink, appearing to read "R. Booth Goodwin II", is written over a horizontal line.

R. BOOTH GOODWIN II  
United States Attorney